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August 6, 2021

Honorable Alison J. Nathan United States District Judge United States Courthouse 40 Foley Square New York, NY 10007

Re: *United States v. Minh Quang Pham* 12 Cr. 423 (AJN)

Dear Judge Nathan:

I write to request a two-week enlargement of time to file defense motions and corresponding adjustment of the previously set schedule. Additional time is needed to review discovery and confer with Mr. Pham.

- 1. The original filing dates:
 - Defense Motions due by August 13th
 - Government Response due by September 24th.
 - Defense Reply due by September October 1st
- 2. No previous request has been made.
- 3. The government consents.
- 4. There is no date for next appearance before the Court.
- 5. Currently, time has been excluded until August 13th. The defense consents to exclusion of time until August 27th.
- 6. The proposed filing dates:
 - Defense Motions due by August 27th
 - Government Response due by October 8th.
 - Defense Reply due by September October 15th

Your consideration is greatly appreciated.

Very truly yours,

/s/

BOBBI C. STERNHEIM

cc: Government Counsel